Remarks

This Amendment is responsive to the Office Action of **May 31, 2005**. Reexamination and reconsideration of **claims 1-49** is respectfully requested.

Summary of The Office Action

Claims 11-12, 22, 36 and 46 were rejected under 35 U.S.C. § 112, second paragraph as being indefinite due to the term "best available."

Claims 1-2, 4-13, 15-25, 27-33, 36-39 and 41-47 were rejected under 35 U.S.C. § 102(e) as being anticipated by Choi (US Pub. 2002/0036710 A1).

Claims 3, 14, 26 and 40 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Choi (US Pub. 2002/0036710 A1) in view of Kain, III et al. (US 6,119,118) submitted by applicant.

Claims 34-35 and 48-49 were rejected under 35 U.S.C. 103(a) as being unpatentable over Choi (US Pub. 2002/0036710 A1) in view of Calia (US 5,450,504).

35 U.S.C. § 112, Second Paragraph, Rejection

The term "best available" in claims 11, 12, 22, 36 and 46 was deemed indefinite. This term has been amended or deleted from the claims. All claims should now comply with all requirements of 35 U.S.C. § 112.

The Present Amendment

Various claims in the present application used the term "standard structure." It will be appreciated that the term "standard" is not intended to be limited to a specific industry standard available at the time of filing of the present application. The term "standard" is simply used to

reflect that a selected structure is used as a desired output, and whatever structure is selected, that one is deemed the standard structure. Thus, an industry standard structure and/or a company specific structure can be selected as a standard structure.

The Present Claims Patentably Distinguish Over the References of Record

Independent Claim 1

Claim 1 has been amended to recite that a set of assets and metadata are received from a digital camera that have been organized by the digital camera into a camera asset organization structure. The method further recites automatically identifying a selected restructuring scheme and using the selected restructuring scheme to convert the camera asset organization structure into a selected organization structure.

Support for the claim amendments can be found, for example, in paragraphs [0009], [0011] and [0012] of the present specification. Thus, no new matter has been added.

Claim 1 was rejected under 35 U.S.C. § 102(e) as being anticipated by Choi. Choi is directed to an image display device in a digital TV. The display device receives audio data, video data and text data through a receiving part (paragraph [0054]). Since the display device is a TV, the data is received from a cable TV station, TV satellite or RF broadcast. Therefore, Choi is not concerned with and fails to teach or suggest receiving a set of assets from a digital camera that have been organized by the camera into a camera asset organization structure as recited in claim 1. Since every claimed element is not taught by Choi, the § 102 rejection is not supported and should be withdrawn.

Another different aspect is that Choi teaches that the received TV image/text data is converted into bit map data (paragraph [0054], [0056]). Thus, Choi converts the TV data (digital or analog signals) into a different type of data (bit map data). This is very different from claim 1.

Claim 1 recites that a set of assets from a digital camera have been organized into a camera asset organization structure and the camera asset organization structure is converted into

a selected organization structure. The type of data of the assets is not converted, but rather the organization of the set of assets is converted. One example is described in paragraph [0009] of the present application. In another example, a computer that is configured to perform the method of claim 1 can receive files from a plurality of digital cameras, each of which might organize its files is a different manner. The computer can more easily process the different file organizations from the different cameras by converting the different file organizations into one selected organization. Choi has nothing to do with this type of method.

Therefore, the method of claim 1 is very different from the teachings of Choi. The conversion of TV data into bit map data as taught by Choi fails to teach or suggest the recited method of claim 1.

Since claim 1 recites features not taught or suggested by the references of record, claim 1 patentably distinguishes over the references of record. Accordingly, dependent claims 2-11 also patentably distinguish over the references and are in condition for allowance.

Independent Claim 12

Claim 12 has been amended to recite an asset normalizing method for processing a collection of digital assets of a digital camera where the collection of digital image assets are organized according to an asset organization scheme generated by the digital camera. The method comprises automatically matching the asset organization scheme of the digital camera to a selected asset normalizer of a predetermined set of asset normalizers and processing the collection of digital image assets of the digital camera into a selected standard organization structure in accordance with the selected asset normalizer.

Claim 12 was rejected under 35 U.S.C. § 102(e) as being anticipated by Choi. As explained previously, Choi is directed to an image display device in a digital TV and converts TV signal data into bit map data. Choi is not concerned with assets from digital cameras, matching organization schemes, or processing organization schemes from digital cameras. Thus, Choi fails to teach or suggest the recited features of claim 12.

Since claim 12 recites features not taught or suggested by the references of record, claim 12 patentably distinguishes over the references of record. Accordingly, dependent claims 13-21 also patentably distinguish over the references and are in condition for allowance.

Independent Claim 22

Claim 22 is directed to a digital camera system for processing a camera-specific organization scheme of digital image assets into a non-camera specific organization format. Support for the claim amendments can be found, for example, in paragraphs [0009], [0011] and [0012] of the present specification. Thus, no new matter has been added.

Claim 22 was rejected under 35 U.S.C. § 102(e) as being anticipated by Choi. As explained previously, the purpose of Choi is to convert TV signal data into bit map data. Thus, Choi is not concerned with camera-specific organization schemes, matching organization schemes to a selected asset organization normalizer, or organizing digital image assets of a digital camera into a non-camera specific organization format. As such, Choi fails to teach or suggest the elements of a comparison component or an asset-processing component as recited in claim 22.

Therefore, claim 22 recites features not taught or suggested by the references of record, individually or in combination. Thus, claim 22 patentably distinguishes over the references of record. Accordingly, dependent claims 23-35 also patentably distinguish over the references and are in condition for allowance.

Independent Claim 36

Claim 36 has been amended to recite a computer-readable medium containing instructions for processing a collection of digital image assets from a digital camera that are organized in a first organization format based on an asset organization scheme into a second organization format. Based on the previous explanations of Choi, Applicant respectfully requests reexamination of amended claim 36. Applicant believes the elements of claim 36 are not taught or suggested and the rejection should be withdrawn.

Thus, claim 36 patentably distinguishes over the reference of record and is in condition for allowance. Accordingly, dependent claims 37-49 also patentably distinguish over the references and are in condition for allowance.

Dependent Claim § 103 Rejections

Claims 3, 14, 26 and 40 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Choi in view of Kain, III et al. and Claims 34-35 and 48-49 were rejected under 35 U.S.C. 103(a) as being unpatentable over Choi in view of Calia.

As these claims depend from independent claims that have been shown to patentably distinguish over the references of record, the arguments above apply equally to their dependent claims. Accordingly, dependent claims 3, 14, 26, 34, 35, 40 and 48-49 patentably distinguish over the references of record and are in condition for allowance.

The references cited but not applied have been considered and do not teach or suggest the recited features of the respective claims, individually or in combination with other references. Therefore, all claims are in condition for allowance.

15

Conclusion

For the reasons set forth above, **claims 1-49** patentably and unobviously distinguish over the references of record and are now in condition for allowance. An early allowance of all claims is earnestly solicited.

Respectfully submitted,

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